

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

SHARON GORE,

Plaintiff,

v.

JOE DUBOSE TRUCKING, et al.,

Defendants.

*
*
*
*
*
*
*
*
*

CASE NO.: 3:06-CV-167-WKW

**MOTION TO AMEND COMPLAINT TO CORRECT THE NAME OF
DEFENDANT FARFARD, INC.**

COMES NOW the Plaintiff, Sharon Gore, the personal representative of the estate of Tullis Gore and moves this Honorable Court for an order permitting her to amend the Complaint in this matter in order to properly identify the Defendant Farfard, Inc. as Defendant Fafard, Inc.

Although the time within which to amend the pleadings under the Scheduling Order governing this action has passed, the Plaintiff seeks only to amend the Second Amended Complaint with regard to the spelling of the Defendant Farfard, Inc.'s name and properly identify this defendant as "Fafard, Inc."

A copy of the proposed Amended Second Amended Complaint is attached hereto as Exhibit A.

Respectfully submitted on this the 20th day of October, 2006.

s/ Randall S. Haynes
Attorney for Plaintiff

OF COUNSEL:

MORRIS, HAYNES & HORNSBY
131 Main Street
Post Office Box 1660
Alexander City, Alabama 35011-1660
Phone: (256) 329-2000
Fax: (256) 329-2015

CERTIFICATE OF SERVICE

I hereby certify that on this the 20th day of October, 2006, I electronically filed the foregoing Motion to Amend the Second Amended Complaint with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record in the above referenced case.

David Lee, Esq.
Parsons, Lee & Juliano
Suite 300, 2801 Hwy. 280 S.
Birmingham, Alabama 35223

Richard Broughton, Esq.
Suite 204, 2000 Interstate Park Drive
Post Office Box 2148
Montgomery, Alabama 36102-2148

s/ Randall S. Haynes
Of Counsel